

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

UNITED STATES OF AMERICA,

\*

Plaintiff,

\*

Case No. 2:20-cr-20148-SHL

v.

\*

**Under Seal**

KATRINA ROBINSON,

\*

Defendant.

\*

---

**MOTION TO SEAL SUPERSEDING INDICTMENT**

---

COMES NOW the United States of America, by and through D. Michael Dunavant, United States Attorney, and Christopher E. Cotten, Assistant United States Attorney for the Western District of Tennessee, and respectfully moves that this Honorable Court enter an order sealing the superseding indictment in the above-styled case. In support of this motion, the United States would show the following:

1. The charges in this case were initially brought by complaint and indictment in July 2020. Those charges generated a considerable amount of media coverage because of the defendant's status as a sitting State Senator.
2. Contemporaneously with the instant superseding indictment, the government is filing a criminal complaint in a new case charging the defendant and two other co-defendants; and the government desires to execute the arrest warrants for both cases at the same time.
3. The United States therefore requests that the superseding indictment be filed under seal so as not to prematurely reveal the existence of the charges to the defendant or to the public

at large so that the arrest warrants can be executed safely and without incident. The United States will move to unseal the superseding indictment once the defendant is arrested.

3. The United States requests a partial unsealing so that copies of the complaint and affidavit can be provided to other law enforcement officers to further the investigation and execution of the arrest warrant.

### **CONCLUSION**

For the foregoing reasons, the United States respectfully requests that the complaint and affidavit be sealed as set forth herein.

Respectfully submitted,

D. MICHAEL DUNAVANT  
United States Attorney

By: /s Christopher E. Cotten  
Christopher E. Cotten  
Assistant United States Attorney  
800 Federal Bldg., 167 N. Main  
Memphis, Tennessee 38103  
(901) 544-4231  
chris.cotten@usdoj.gov